

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Commission,     ) Application No. C-3049  
on its own motion, to conduct an     )  
investigation into possible             ) ORDER SEEKING COMMENTS  
solutions for extending the life     ) AND SETTING HEARING  
of area codes 308 and 402.             )

Entered: March 30, 2004

BY THE COMMISSION:

In 1999, NeuStar, responsible for oversight of North America Numbering Plan resources, notified the Commission that assignable numbering resources in the 402 area code were forecasted to exhaust during the fourth quarter of 2000. Since that time, the Commission has taken significant conservation steps to delay or avoid exhaustion of assignable numbers in the state. NeuStar's forecasted exhaust of the 402 area code resulted in the Commission opening Docket No. C-2057/PI-28, "In the Matter of the Commission, on its own motion, to conduct an Investigation into the Potential Exhaust of Assignable Telephone Numbers Within the 402 Area Code," on June 8, 1999.

The Commission held a public workshop in Docket No. C-2057/PI-28 during which the industry identified three area code splits and one area code overlay as possible relief plans to implement upon the exhaust of adequate numbering resources in the 402 area code. Ultimately, the Commission sought and obtained authority from the Federal Communications Commission to implement thousands-block number pooling in the 402 numbering plan area (NPA). On May 1, 2001, thousands-block number pooling began in the Omaha Metropolitan Statistical Area (MSA) 402 NPA.

In addition, the Commission opened Docket No. C-2830/PI-66, "The Commission, on its own motion, to Review the Qwest Corporation Rate Center Consolidation Plan." Rate center consolidation helps delay the exhaust of an area code by reducing assignment of new full prefixes, which minimizes unused or stranded numbers. Consolidating two or more rate centers also makes unassigned numbers available throughout the new rate center.

Pursuant to the Commission's order entered March 11, 2003, in Docket No. C-2830/PI-66, Qwest Communications (Qwest) has consolidated nine rate centers into four, without any changes to existing local calling areas for Qwest customers or significant changes to the Qwest network. Consolidation of the Qwest rate centers was completed in October 2003.

By March 2005, number pooling and rate center consolidation in the Omaha MSA resulted in the return of 618 thousands-blocks

to the numbering resource pool of which 85 have been reassigned. The NeuStar "NXX Saved Report" indicates the 79 thousands-blocks assigned to the Omaha Rate Center since the inception of pooling saved four full NXX codes. As a result of this conservation activity, the Commission notes the original forecasted exhaust date has been periodically revised and is currently the second quarter of 2005.

In spite of these efforts, exhaustion of numbering resources in the 402 area code remains imminent. The implementation of a new area code adopting either a split or overlay plan will have significant impacts on carriers, businesses, and the general public. Thousands-block number pooling and rate center consolidation are viable options that will extend the life of existing number resources in an area code thereby delaying the implementation of an area code relief plan.

Rate centers encompass specific geographical areas and historically have been used by the telecommunications industry to distinguish between local and toll calls. Small rate centers may contain only a single exchange or switch thereby stranding valuable numbering resources that could be utilized in adjacent rate centers that may consist of multiple exchanges and/or switches. As local calling areas have expanded over the years through the implementation of Extended Area Service offerings, it has become evident that there are situations in which two or more rate centers have the same local calling area and are contiguous to one another. These scenarios may represent ideal candidates for rate center consolidation in the future in order to further conserve numbering resources. Furthermore, new communications technologies, such as Voice-over Internet Protocol (VoIP), enable service providers to offer numbering resources from one geographical area to users in a separate geographical area. Therefore, a user no longer needs to be physically resident in the rate center to utilize the numbering resources assigned to that rate center which has the potential to further exacerbate the exhaust of resources throughout Nebraska.

It is the stated goal of the Commission to implement thousands-block number pooling and further rate center consolidation in an effort to extend the life of the 308 and 402 area codes in the most efficient and cost effective manner possible. It is the Commission's belief that full industry participation in thousands-block number pooling is essential to adequately protect numbering resources, to extend the life of the 402 and 308 area codes and to avoid implementation of one of

the area code relief plans identified in Docket No. C-2057/PI-28.

The Commission further recognizes that carrier participation in thousands-block number pooling can be accomplished with varying levels of change to operational procedures, switch software and network routing infrastructure elements. It is the Commission's belief that the implementation methodologies available to carriers includes, but is not limited to: a) using standard switch translation tables to route calls to numbers residing in a carrier's end-office switch, or to other carrier's switches connected by dedicated trunks; b) full implementation of Local Number Portability (LNP)/Local Routing Number (LRN) switch software and the attendant changes to operational procedures and network routing infrastructure.

Therefore, the Commission proposes that carriers implement use of thousands-block number pooling outside of the top 100 MSAs and explore further rate center consolidation to return valuable number resources to the pool and further extend the life of both 402 and 308 area codes. All carriers that have been assigned number resources in the 402 and 308 area codes, and any other interested parties, should comment on the specific issues listed below. In addition, the Commission encourages comments on any other subject germane to thousands-block number pooling or rate center consolidation not specifically addressed by the following Commission's inquiries:

1. Is your company willing to participate in the implementation of voluntary thousands-block number pooling for each rate center in which your company has switch and numbering resources in the 402 and 308 area codes consistent with the Commission's goals described herein?
2. Please provide input regarding the most efficient and cost effective manner for your company to meet the Commission's goal of implementing thousands-block number pooling in the 402 and 308 area codes.
3. Please provide an estimated cost of implementing voluntary thousands-block number pooling for each of your switches using the methodology described above.
4. Please identify a possible time line for implementation of thousands-block number pooling described above.
5. Please identify any obstacles or concerns to your company's voluntary participation in thousands-block number pooling in the 402 and 308 area codes.

6. Is your company willing to consider participating in rate center consolidation in geographical areas later determined by the Commission to be useful in the further conservation of number resources?
7. Please identify any obstacles to your company's participation in rate center consolidation.

Written comments should be filed by interested parties on or before April 26, 2004. All parties filing comments should file one original, five paper copies and one electronic copy in MS Word or PDF format.

A public hearing is hereby scheduled for May 5, 2004, at 10:00 a.m. CST in the Commission Hearing Room, 300 The Atrium, 1200 N Street, Lincoln, Nebraska to review the comments submitted and discuss further the number pooling and rate center consolidation plan proposed in Nebraska.

#### O R D E R

IT IS THEREFORE ORDERED by the Nebraska Public Service Commission that all telecommunications carriers certificated in Nebraska having numbering resources in the 308 or 402 area codes or any other interested parties are asked to respond to the inquiries proposed in this order on or before 5:00 p.m., on April 26, 2004. The information should be provided in a MS Excel or Microsoft Word format with one hard copy submitted with the response and one electronic copy provided either in disk/CD format with the response or sent via email to [jraffety@mail.state.ne.us](mailto:jraffety@mail.state.ne.us) and [amelton@mail.state.ne.us](mailto:amelton@mail.state.ne.us).

IT IS FURTHER ORDERED that a public hearing is hereby scheduled for May 5, 2004, at 10:00 a.m. CST in the Commission Hearing Room, 300 The Atrium, 1200 N Street, Lincoln, Nebraska to review the comments submitted and discuss further the state-wide number pooling in Nebraska.

MADE AND ENTERED at Lincoln, Nebraska, this 30th day of March, 2004.

NEBRASKA PUBLIC SERVICE COMMISSION

COMMISSIONERS CONCURRING:

Chairman

ATTEST:

Executive Director